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14	TAIWÁN SEMICONDUCTOR M COMPANY, LTD.	RING			
15	UNITED STATES DISTRICT COURT				
16	NORTHERN DISTRICT OF CALIFORNIA				
17	TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY	, LTD.,	Case No. C-03-5	761 MMC JCS	
18		Plaintiff,	DOCUMENTS		
19	V.		[PROPOSED] C	ORDER	
20	SEMICONDUCTOR MANUFAC TURING	TURING	Courtroom: A, 1	5th Floor	
21	INTERNATIONAL CORPORATI SEMICONDUCTOR MANUFAC	TURING		Honorable Joseph C. Spero	
22	INTERNATIONAL (SHANGHAI COMPANY, LTD.; and SMIC AN				
23	Det	fendants.			
24 25					
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	PLAINTIFF'S REQUEST TO) FILE DOCUME CASE NO. C-03-		[PKOPOSED] OKDEK	

1	Pursuant to Civil Local Rules 7-10 and 79-5, and the August 10, 2004 Order of this Court	
2	granting Plaintiff's Request to File Documents Under Seal, Plaintiff Taiwan Semiconductor	
3	Manufacturing Co., Ltd. ("TSMC"), through its undersigned counsel, hereby requests that the	
4	Court permit TSMC to file the following document under seal:	
5	• The unredacted version of the Reply In Support of Plaintiff's Motion to Compel	
6	Defendants' Production of Documents Required by Patent Local Rule 3-4(a).	
7	The unredacted version of TSMC's reply brief contains references to TSMC trade secret	
8	information in Exhibit C to the Declaration of Jeffrey R. Chanin in Support of Plaintiff's Motion	
9	to Compel Defendants' Production of Documents Required by Patent Local Rule 3-4(a), which is	
10	entitled to confidential treatment under Patent Local Rule 2-2, and which this Court ordered to be	
11	sealed on August 10, 2004. See Order granting Plaintiff's Request to File Documents Under	
12	Seal (filed August 10, 2004).	
13	In light of the foregoing, TSMC requests that the Court allow TSMC to file under seal the	
14	unredacted version of its Reply In Support of Plaintiff's Motion to Compel Defendants'	

Production of Documents Required by Patent Local Rule 3-4(a). TSMC respectfully submits
that this Request to File Documents Under Seal is narrowly tailored within the meaning of Civil
Local Rule 79-5. TSMC therefore requests that the Court permit the sealing of the documents
set forth above, and order that the Clerk of the Court maintain them in accordance with the
provisions of Local Civil Rule 79-5(e).

- 20 Dated: August 13, 2004 21 22 23 24
 - By: <u>/s/ Daniel E. Jackson</u> DANIEL E. JACKSON

KEKER & VAN NEST, LLP

DANIEL E. JACKSON Attorneys for Plaintiff TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.

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1	[PROPOSED] ORDER				
2	Pursuant to Civil Local Rules 7-10 and 79-5, and the August 10, 2004 Order of this Court				
3	granting Plaintiff's Request to File Documents Under Seal, Plaintiff Taiwan Semiconductor				
4	Manufacturing Co., Ltd. ("TSMC") has applied to this Court for an order permitting it to file				
5	under seal the unredacted version of its Reply In Support of Plaintiff's Motion to Compel				
6	Defendants' Production of Documents Required by Patent Local Rule 3-4(a).				
7	GOOD CAUSE APPEARING THEREFOR, TSMC's request is hereby GRANTED. The				
8	Clerk is directed to maintain the unredacted version of TSMC's Reply In Support of Plaintiff's				
9	Motion to Compel Defendants' Production of Documents Required by Patent Local Rule 3-4(a)				
10	in accordance with the provisions of Civil Local Rule 79-5(e).				
11					
12	IT IS SO ORDERED.				
13					
14	Dated: August 16, 2004 /s/ Joseph C. Spero HON. JOSEPH C. SPERO				
15	United States Magistrate Judge				
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	PLAINTIFF'S REQUEST TO FILE DOCUMENTS UNDER SEAL; [PROPOSED] ORDER CASE NO. C-03-5761 MMC JCS				